

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

**MARY DOE, as next friend of minor
plaintiff, JANE DOE,**

Plaintiff,

v.

**ROBLOX CORPORATION and
DISCORD INC.,**

Defendants.

Civil Action No. 3:25-cv-00128

**DECLARATION OF J. ALEXANDER LAWRENCE IN SUPPORT OF
DEFENDANT DISCORD INC.'S MOTION TO DISMISS**

I, J. ALEXANDER LAWRENCE, declare:

1. I am a partner in the law firm of Morrison & Foerster LLP, counsel of record for defendant Discord Inc. ("Discord") in this action. I make this declaration on my own personal knowledge, and if called as a witness to testify, I could and would testify competently to the following facts:

2. Attached as Exhibit A is a true and correct copy of Discord's Transparency report: July – September 2022, which is available publicly at the following URL: <https://discord.com/blog/discord-transparency-report-q3-2022>.

3. Attached as Exhibit B is a true and correct copy of Discord's Transparency report: January – March 2023, which is available publicly at the following URL: <https://discord.com/safety-transparency-reports/2023-q1>.

4. Attached as Exhibit C is a true and correct copy of Discord's Transparency report: January – June 2024, which is available publicly at the following URL: <https://discord.com/safety-transparency-reports/2024-h1>.

5. Attached as Exhibit D is a true and correct copy of Discord's Commitment to a Safe and Trusted Experience, which is available publicly at the following URL: <https://discord.com/safety/360043700632-discords-commitment-to-a-safe-and-trusted-experience>.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 27, 2025 in New York, New York.


J. Alexander Lawrence